

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

MOMENTIVE SPECIALTY)	CASE NO. 2:11-CV-00583
CHEMICALS, INC., et al.,)	
)	
Plaintiffs,)	JUDGE EDMUND A. SARGUS
)	MAGISTRATE JUDGE ELIZABETH
)	DEAVERS
)	
v.)	<u>UNOPPOSED MOTION FOR</u>
)	<u>EXTENSION OF TIME</u>
CHARTIS SPECIALTY INSURANCE)	
COMPANY, et al.,)	
)	
Defendants.)	

Defendant Chartis Specialty Insurance Company (“CSIC”) respectfully moves the Court for an extension of time until September 26, 2011, in which to move or plead to Plaintiffs’ Complaint in the captioned matter. Counsel for CSIC has conferred with Plaintiffs’ counsel, who advised that they do not object to the requested extension of time per an agreement dated July 18, 2011 by which CSIC and Plaintiffs have agreed to, among other things, exchange documents on or before August 19, 2011. CSIC respectfully submits that the additional time is not requested for purposes of delay and that granting of the present Motion will not prejudice the parties, but rather will further the interests of justice in the captioned matter. *See Ungar v. Sarafite*, 376 U.S. 575 (1964); *Noble v. Black*, 539 F.2d 586 (6th Cir. 1976). CSIC has not requested any prior extensions of time.

Respectfully submitted,

/s/ Crystal L. Nicosia

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International Specialty Lines Insurance
Company*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically this 22nd day of July, 2011. Notice of this filing will be sent to Counsel for Plaintiffs, Albert J. Lucas, Brian Condon, Randy Paar and Tamara Bruno and Counsel for Defendant Aon Risk Services Northeast, Inc., Matthew J. Burkhardt by operation of the Court's filing system. Parties may access this filing through the Court's system. Notice of this filing will be sent to Counsel for Plaintiffs, Michael Brittain, Calfee, Halter & Griswold, 1400 McDonald Investment Center, 800 Superior Avenue, Suite 1800, Cleveland, Ohio 44114-2688 and Defendant Willis North America, Inc., c/o CT Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929 via regular U.S. Mail, postage prepaid this 22nd day of July, 2011.

/s/ Crystal L. Nicosia

*One of the Attorneys for Defendant Chartis
Specialty Insurance Company f/k/a American
International Specialty Lines Insurance
Company*